

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DEC 18 2019
US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

MAYURESH SURESH IYER

DOCKET NO. 3:19-cr-00388-FDW

BILL OF INDICTMENT

Violation:

18 U.S.C. § 2252A(a)(2)(B)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT ONE

On or about July 27, 2019, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

MAYURESH SURESH IYER

did knowingly distribute and attempt to distribute, any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer

All in violation of Title 18, United States Code, Section 2252A(a)(2)(B) and 2.

COUNT TWO

Between in or about July 2019 to in or about October 2019, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

MAYURESH SURESH IYER

knowingly possessed, and accessed with intent to view, any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF FORFEITURE

Notice is hereby given of 18 U.S.C. § 2253. The following property is subject to forfeiture in accordance with Section 2253:

- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received during the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b) and (c).

A TRUE BILL:



R. ANDREW MURRAY
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Mr. Odulio", written over a horizontal line.

MARK T. ODULIO
ASSISTANT UNITED STATES ATTORNEY